

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Vincent Graham
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association as Trustee for the Igloo
Series IV Trust
v.

Vincent Graham
Roberta Graham – Co-Debtor
Jack N. Zaharopoulos
Respondents

CASE NO.: 23-00162-MJC

CHAPTER 13

Judge: Mark J. Conway

Hearing Date: April 12, 2024 @ 10:00 AM

Objection Deadline: March 19, 2024

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR
STAY**

PLEASE TAKE NOTICE, that SN Servicing Corporation as servicer for U.S. Bank Trust National Association as Trustee for the Igloo Series IV Trust (on behalf of itself and together with any successor and/or assign “Movant”), filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay pursuant to 11 U.S.C. § 362 (d)(1) with respect to the property located at 585-587 McKinley Street, Hazleton, PA 18201.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before March 19, 2024 you or your attorney must do all of the following:

- (a) file an answer explaining your position at
United States Bankruptcy Court
Middle District of Pennsylvania
Max Rosenn U.S. Courthouse
197 South Main Street, Room 274
Wilkes-Barre, PA 18701

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren Moyer
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Phone: (212) 471-5100
Fax: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Mark J. Conway at Max Rosenn U.S. Courthouse , 197 South Main Street, Room 274, Wilkes-Barre, PA 18701 on April 12, 2024 at 10:00 AM , unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 570-831-2500 to find out whether the hearing has been canceled because no one filed an answer.

Dated: March 5, 2024

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
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TO:

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Bankruptcy Co-Debtor

Vincent Graham
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Bankruptcy Debtor

Jack N. Zaharopoulos
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Attorney

Asst. U.S. Trustee
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Harrisburg, PA 17102
United States Trustee